

United States Courts
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

AUG 20 2021

Nathan Ochsner, Clerk of Court

STEPHEN J. DICKERSON,
ASHLEY ROBINSON, and
NAILA JACKSON, et al

PLAINTIFFS

V.

THE STATE OF TEXAS,
GREGORY WAYNE ABBOTT, and
THE TEXAS WORKFORCE
COMMISSION,

DEFENDANTS

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CIVIL ACTION

NO.

JURY

DEMANDED

PLAINTIFFS' MOTION FOR A TEMPORARY INJUNCTION

TO THE HONORABLE _____
UNITED STATES DISTRICT JUDGE:



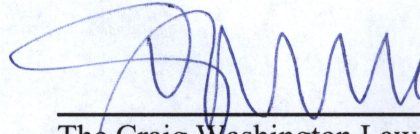
COMES NOW THE PLAINTIFFS, and moves this Honorable Court to grant a hearing on this Motion for a Temporary Injunction, and respectfully shows as follows:

1. Plaintiffs incorporate by reference all of the factual and substantive allegation in their COMPLAINT as though set out here word-for-word.
2. Plaintiffs also incorporate the Affidavits of Fact attached hereto and marked "Exhibit A".
3. Plaintiffs respectfully requests a hearing on this, their Motion for a Temporary Injunction in order to prevent irreparable harm for which they have no adequate remedy.
4. Plaintiffs will prevail upon the merits when their COMPLAINT is adjudicated upon final trial.

PRAYER

WHEREFORE, PLAINTIFFS respectfully request that this Honorable Court favorably consider and grant this Motion for a Temporary Injunction.

Respectfully submitted,

A handwritten signature in blue ink, consisting of a large, stylized 'C' followed by several vertical strokes, positioned above a horizontal line.

The Craig Washington Law Firm
State Bar No. 20901000
washlawfirm@aol.com
P.O. Box 306
Bastrop, Texas 78602
Phone: (713) 385-9060

ATTORNEYS FOR PLAINTIFFS

EXHIBIT “A”

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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ASHLEY ROBINSON, and
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CIVIL ACTION

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JURY

DEMANDED

AFFIDAVIT OF FACTS

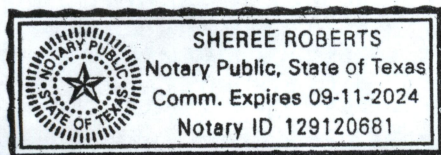
BEFORE ME, the undersigned authority, personally appeared ASHLEY ROBINSON on this, the 20TH day of August 2021, and after being sworn by me, did, upon OATH depose and say:

“My name is Ashley Robinson and I am eligible for and was receiving benefits from being unemployed.

I have been cut off from the benefits I was receiving without being given an opportunity to express how the loss of benefits affects my ability to maintain a source of income and a method to eat, have shelter and live as a human being, as a citizen of this country.

The harm done to me is incomprehensible! No amount of future damages can possibly compensate me for the loss of dignity, health and well-being. I will suffer without provision of assistance to which I am entitled.”

FURTHER, AFFIANT SAYETH NOT.



8-20-2021 *SR*

Ashley Robinson
Ashley Robinson
(Printed Name)

NOTARY PUBLIC IN AND FOR
HARRIS COUNTY, TEXAS

Sherree Roberts

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

STEPHEN J. DICKERSON,
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CIVIL ACTION

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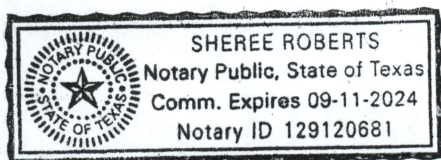
BEFORE ME, the undersigned authority, personally appeared NAILA JACKSON on this, the 20TH day of August 2021, and after being sworn by me, did, upon OATH depose and say:

“My name is Naila Jackson and I am eligible for and was receiving benefits from being unemployed.


I have been cut off from the benefits I was receiving without being given an opportunity to express how the loss of benefits affects my ability to maintain a source of income and a method to eat, have shelter and live as a human being, as a citizen of this country.

The harm done to me is incomprehensible! No amount of future damages can possibly compensate me for the loss of dignity, health and well-being. I will suffer without provision of assistance to which I am entitled.”


FURTHER, AFFIANT SAYETH NOT.



on August 20th 2021.


(Printed Name) Naila Jackson

NOTARY PUBLIC IN AND FOR
HARRIS COUNTY, TEXAS



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

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CIVIL ACTION

NO.

JURY

DEMANDED

AFFIDAVIT OF FACTS

BEFORE ME, the undersigned authority, personally appeared Stephen J. Dickerson on this, the 19th day of August, 2021, and after being sworn by me, did, upon OATH depose and say:

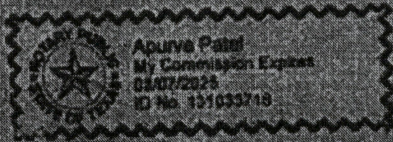
"My name is Stephen J. Dickerson and I am eligible for and was receiving benefits from being unemployed.

I have been cut off from the benefits I was receiving without being given an opportunity to express how the loss of benefits affects my ability to maintain a source of income and a method to eat, have shelter and live as a human being, as a citizen of this country.

The harm done to me is incomprehensible! No amount of future damages can possibly compensate me for the loss of dignity, health and well-being. I will suffer without provision of assistance to which I am entitled."

FURTHER, AFFIANT SAYETH NOT.

Stephen J. Dickinson
(Printed Name)



NOTARY PUBLIC IN AND FOR
HARRIS COUNTY, TEXAS

[Signature]